

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CASE No. 1:20-CV-11889-MLW

Dr. SHIVA AYYADURAI)	
Plaintiff,)	
)	
v.)	
)	
WILLIAM FRANCIS GALVIN,)	
MICHELLE K. TASSINARI,)	
DEBRA O'MALLEY,)	JURY DEMANDED
AMY COHEN,)	
NATIONAL ASSOCIATION OF)	
STATE ELECTION DIRECTORS,)	
all in their individual capacities, and)	
WILLIAM FRANCIS GALVIN,)	
in his official capacity as Secretary)	
of State for Massachusetts,)	
Defendants.)	

MOTION FOR JOINDER
AND LEAVE TO FILE A SECOND AMENDED COMPLAINT

On February 19, 2021, this court ordered the Plaintiff to consider adding Twitter Inc., a Delaware Corporation, as a defendant in this case, because it was “questionable whether the court may grant plaintiff complete relief on his Motion if Twitter is not a party to this case. Such relief may also implicate Twitter's interests, which could be impaired in its absence.”

Plaintiff hereby files this motion for joinder and leave to amend his complaint in order to add Twitter as a defendant and add claims against Twitter. Based on the accompanying affidavit and memorandum of law, the motion must be granted.

Respectfully submitted under the pains and penalties of perjury,

Date: February 26, 2021

/s/ Dr. Shiva Ayyadurai

Dr. Shiva Ayyadurai
Plaintiff, *pro se*
701 Concord Ave,

Cambridge, MA 02138
Phone: 617-631-6874
Email: vashiva@vashiva.com

CERTIFICATE OF SERVICE

Plaintiff certifies that he served this motion, memorandum and affidavit upon Defendants via their counsel via ECF.

Respectfully submitted under the pains and penalties of perjury,

/s/ Dr. Shiva Ayyadurai

Date: February 26, 2021

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CERTIFICATE OF CONFERRAL PER LR 7.1

Plaintiff certifies that he conferred with counsel for Galvin, Tassinari and O'Malley on this motion and these Defendants declared that they had no position, for or against, this motion for joinder and leave to amend. Plaintiff further certifies that he conferred with counsel for Cohen and NASED and these Defendants indicated that they would oppose this motion when filed. Counsel for Cohen and NASED also informed Plaintiff that Twitter is immune per Section 230.

Respectfully submitted under the pains and penalties of perjury,

/s/ Dr. Shiva Ayyadurai

Date: February 26, 2021

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